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October 18, 2022

Honorable Cecelia G. Morris  
United States Bankruptcy Judge  
Southern District of New York  
U.S. Bankruptcy Court  
300 Quarropas Street  
White Plains, NY 10601-4140

Re: John W. Wells  
Bankruptcy Case No: 22-22472-cgm

Dear Judge Morris:

This office represents the Secured Creditor, SN Servicing Corporation, as servicer for U.S. Bank Trust N.A., as Trustee of the Bungalow Series IV Trust ("SN") in the above-referenced action. Pursuant to the Court's Loss Mitigation Order entered on September 16, 2022, please let this letter serve as a status report and summary of what has transpired between the parties.

SN initially filed an Objection to Loss Mitigation (ECF Doc. No. 13, filed August 5, 2022, the "Objection"). The primary basis for the Objection was that SN has been offering the Debtor various versions of an existing permanent loan modification since November 2021. However, the Debtor has never accepted said modification, or obtained the signature of his estranged spouse to finalize same.

SN remains willing to extend a loan modification to the Debtor on the same or similar terms to those attached to the Objection. On October 18, 2022, undersigned counsel emailed the Debtor's Attorney to ask whether the Debtor was willing to get any version of the existing modification offer fully executed. If so, our office will facilitate same, including generation of any updated modification offer acceptable to SN.

SN respectfully requests that any permanent loan modification that may be offered be fully executed on or before the November 17, 2022 loss mitigation date.

Lastly, SN notes that the financial package attached to its Creditor Loss Mitigation Affidavit is not



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needed, given that a permanent loan modification has been offered since November 2021.

**Please feel free to contact our office should you have additional questions.**

Sincerely,

Dated: October 18, 2022

/s/ Katherine Heidbrink

Katherine Heidbrink, Esq.

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